

LAW OFFICE OF
ZACHARY MARGULIS-OHNUMA

April 17, 2018

Via Email and ECF

David Gopstein
Assistant United States Attorney
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

RE: U.S. v. Naray Palaniappan, 15 Cr. 485

Dear Mr. Gopstein:

This office represents the defendant Naray Palaniappan in the above-captioned case. I write pursuant to Rule 16 of the Federal Rules of Criminal Procedure to request the following materials:

1. The "unique identifier" generated by the Network Investigative Technique ("NIT") used to distinguish data sent by Mr. Palaniappan's computer from that of other "activating" computers. See Attachment B of NIT Warrant ¶ 2.
2. The portion of the NIT code that generated the "unique identifier" sufficient for our office to verify the degree to which the identifier was unique as to each visitor to the PlayPen website.
3. The portion of the NIT code that identified the type of operating system running on the computer targeted by the NIT. See Attachment B of NIT Warrant ¶ 3.

260 MADISON AVENUE • NEW YORK, NY 10016
(212) 685-0999 • ZACH@ZMOLAW.COM
WWW.ZMOLAW.COM

LAW OFFICE OF ZACHARY MARGULIS-OHNUMA

4. The source code, Hypertext Markup Language ("HTML"), or other scripting language for the PlayPen login page and the page immediately after the user logs into PlayPen.
5. The "instructions sent to [Mr. Palaniappan's] computer and executed that produced the NIT results." See ECF No. 24 at 4 (June 16, 2016 Gov't Discovery Response Letter).
6. The "two-way network data stream showing the data sent back-and-forth between the defendant's computer and the government-controlled computer as a result of the execution of the NIT." Id.
7. The Internet Protocol address of the "government-controlled computer" that the NIT sent data to. Id.
8. Any and all 'cookies' that were sent to Mr. Palaniappan's computer by either the NIT or the PlayPen website.

Due to the financial limitations of our client, we are unable to retain a computer expert that can travel to the FBI office in New York. We therefore respectfully request that the foregoing information be provided to our office via U.S. Mail or email.

Thank you for your attention to this case.

Very truly yours,

Adam Elewa

Adam Elewa